

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CENTRAL DIVISION**

VEROBLUE FARMS USA, INC.	)	
	)	
Plaintiff,	)	
	)	No. 18-CV-3047
v.	)	
	)	
LESLIE A. WULF, BRUCE A. HALL	)	<b>DEFENDANTS WULF, HALL, J. REA,</b>
JAMES REA, JOHN E. REA, and	)	<b>T. REA’S MOTION TO QUASH</b>
KEITH DRIVER,	)	<b>SUBPOENAS OR FOR PROTECTIVE</b>
	)	<b>ORDER</b>
	)	
Defendants.	)	

**COME NOW** Defendants Leslie Wulf, Bruce Hall, James Rea, and John (“Ted”) Rea, pursuant to Federal Rule of Civil Procedure 45(d)(3) and 26(c) and Local Rule 7, and for their Motion to Quash Subpoenas or for Protective Order, state:

1. On February 12, 2019, Plaintiff VeroBlue Farms USA, Inc. provided Notice of its intent to serve subpoenas on the following entities:

- a. Goldstein & McClintock LLP;
- b. Horwood Marcus & Berk;
- c. Beecher, Field, Walker, Morris, Hoffman & Johnson, P.C.;
- d. FishDish LLC;
- e. William J. Turk;
- f. First State Bank;
- g. Wells Fargo;
- h. Comerica Bank;
- i. Bank of America, N.A.; and
- j. Kenneth Lockard.

2. The foregoing entities are law firms engaged or contacted by Defendants, financial institutions where Defendants hold accounts, and shareholders who object to Plaintiff's Chapter 11 Bankruptcy plan.

3. Plaintiff's subpoenas broadly request the following information:

- a. Any and all documents and communications relating to VBF.
- b. Any and all documents and communications relating to the Complaint.
- c. Any and all documents and communications relating to, or with, Defendants.
- d. Any and all documents and communications relating to, or with, Defendants' counsel, including but not limited to Staci [sic] Codr, Kim Annello, and/or Heath Cheek or their law firms, Finley Law Firm, P.C., Exall + Wood, PLLC, and Bell Nunnally & Martin LLP.
- e. Any and all other documents and communications relating in any way to the attached December 19, 2018 letter from Thomas Fawkes; the attached December 20, 2018 letter from Aaron Hammer; and the attached January 9, 2019 letter from Sean Maniaci including, but not limited to, outlook calendar appointments, invoices, engagement letters, agreements, witness statements (whether stand-alone or contained in another document), memoranda, notes of communications, and other documents.
- f. Any and all other documents and communications that relate to any investigation performed as to the attached letters.
- g. Any and all statements of any witnesses, whether included in affidavits, transcripts, or contained within any other format.

4. Defendants request the court quash the subpoenas, in their entirety, because they; i) seek communications relevant to challenges to VBF's Chapter 11 reorganization plan, ii) require disclosure of privileged or other protected matter, including information protected by the attorney-client privilege and common-interest privilege, and iii) seek disclosure of confidential personal and/or commercial information. Fed R. Civ. P. 45(d)(3).

5. Alternatively, Defendants request the court enter a protective order forbidding the disclosure or discovery. Fed. R. Civ. P. 26(c)(1)(A).

6. Pursuant to Local Rule 7, Defendants attached hereto and incorporate by reference a Brief in Support, containing the grounds for the motion and citations to the authorities upon which Defendants rely for the relief requested herein.

WHEREFORE, Defendants Leslie Wulf, Bruce Hall, James Rea, and John ("Ted") Rea respectfully request the Court enter an Order quashing the subpoenas issued to the above-mentioned entities or enter an Order forbidding the disclosure sought by the subpoenas.

Date: February 24, 2019

LESLIE WULF, BRUCE HALL,  
JOHN (TED) REA, JAMES REA

By: /s/ Kimberly D. Annello

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**Attorneys for Defendants, Leslie Wulf,  
Bruce Hall, John (Ted) Rea, and James  
Rea**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 25, 2019 a true and correct copy of the above and foregoing was served upon counsel of records for all parties via ECF Service.

/s/ Kimberly D. Annello